

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**LUIS PINTO, SJUR MADSGARD, and  
FUTURE HOLDINGS ASSOCIATES,  
LLC,**

Plaintiffs,

vs.

**ALLSTATE INSURANCE COMPANY,**

Defendant.

Case No. 1:22-CV-07167

Honorable Joan B. Gottschall

Honorable Maria Valdez

**DEFENDANT ALLSTATE INSURANCE COMPANY’S MOTION  
FOR EXTENSION OF TIME TO ANSWER, PLEAD, OR OTHERWISE MOVE**

Defendant Allstate Insurance Company (“Allstate”) hereby moves for an extension of time to answer, plead, or otherwise move in response to Plaintiffs’ Complaint for Monetary and Declaratory Relief (the “Complaint”). In support thereof, Allstate states as follows:

1. Plaintiffs filed this action on December 20, 2022. Plaintiffs allege, among other things, that Allstate breached an agreement it entered into with the Plaintiffs, who are former Allstate independent contractor insurance agents. *See* Compl. ¶¶ 100–114. Plaintiffs also allege that Allstate fraudulently induced them into entering into an agency agreement with Allstate, bringing claims for fraudulent inducement (*id.* at ¶¶ 115–123), intentional infliction of emotional distress (*id.* at ¶¶ 124–128), and, in the alternative, unjust enrichment (*id.* at ¶¶ 129–142).

2. Although Allstate was served with the action on February 24, 2023, attorneys handling this case did not receive a copy of the Complaint until March 3, 2023. At present, Allstate’s responsive pleading is due on March 17, 2023.

3. Allstate respectfully requests that it be granted a 31-day extension from March 17, up to and including Monday, April 17, 2023, at which time Allstate will file its responsive pleading.

The requested extension is sought in order to allow Allstate, through its counsel, to investigate and assess Plaintiffs' factual and legal allegations.

4. Counsel for Allstate attempted to contact counsel for Plaintiffs to determine whether Plaintiffs would oppose this motion on March 10, 2023 and March 14, 2023. Plaintiffs' counsel has not responded to Plaintiff's counsel. Accordingly, the Parties have not met and conferred regarding this request.

5. This is Allstate's first request for an extension in this matter; no prior extension has been sought or granted.

Wherefore, Defendant Allstate Insurance Company respectfully request that the Court grant this motion for an extension of time to answer, plead, or otherwise move in response to Plaintiffs' Complaint up to and including April 17, 2023, and for all other relief the Court deems just.

Dated: March 15, 2023

Respectfully submitted,

By: /s/ J. Scott Humphrey  
J. Scott Humphrey  
Kate Watson Moss  
Samantha Roth  
Benesch, Friedlander, Coplan &  
Aronoff LLP  
71 South Wacker Drive, Suite 1600  
Chicago, Illinois 60606-4637  
Telephone: 312.212.4949  
Facsimile: 312.767.9192

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of March, 2023, the foregoing was filed electronically. Notice of this filing will be sent to all parties of record by operation of the Court's electronic filing system.

/s/ J. Scott Humphrey  
J. Scott Humphrey

*One of the Attorneys for Defendant Allstate  
Insurance Company*

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**[PROPOSED] ORDER**

After considering Defendant Allstate Insurance Company's Motion for Extension of Time To Answer, Plead, or Otherwise Move, the Court, for good cause shown,

GRANTS the motion and extends Defendant Allstate Insurance Company's time to answer, plead, or other move an additional 31 days until Monday, April 17, 2023.

SIGNED on \_\_\_\_\_, 2023.

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